

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

CHUCK STREBLOW, SARAH
HOUSTON, IMAGINATION
INDUSTRIES, INC. dba THE
AMERICAN DREAM BAR, JANE
DOE DANCERS #1 – 7, JOHN
DOE SECURITY GUARDS #1 – 5,
JOHN & JANE DOE CUSTOMERS
#1 – 11, and all Similarly Situated
Residential & Commercial
Neighbors of Club 180,

Plaintiffs,

versus,

CLUB 180, AM314, LLC,
MATTHEW LONGCOR, AYDEN
LONGCOR, NICHOLAS SCALISE
dba DJ NEXT1, ERIC
HAVERMANN, ELLIE JAEKE,
EVRON, INC., SEVEN OAKS
INVESTMENT CORP., HIGHLAND
ASSOCIATES, INC., CTS, LLC,
PTM, INC., NANCY WAGGENER,
PAUL WAGGENER, BRAVO1
SECURITY, INC., MICHAEL
ELAYAN, MIROSLAVA KOTSAN,
STU SLEEPER aka STUPAC X,
DAVID EKDAHL, CHAD
MCMAHON, JAMES PULL, IVON
PENNY, BLAIKE KOCA, MARLEY
NYGAARD, ROMAN, JALIL
TOOKHI, MALIK HARMON,
ABDUL RAHMANZAI aka
JAMAAL, DAVID LOOLOO, TONY
PHAM, BREANNA PHAM-CARR,
THROWBACK EMPIRE, LLC dba
KRUSH ULTRA LOUNGE, BRE
MANNING aka ROSE, BROOKE

Case No. 8:25-cv-00241-JFB-RCC

MOTION FOR EXTENSION OF
TIME TO FILE A RESPONSIVE
PLEADING

LEIBERT aka MALIBU, ELENA
RHODD-MORALES aka STARR,
CHRISTINA CRAFT aka SKYLA,
KATHERINE TEDI SMITH aka
SIENNA, , ECHO, AMIRA,
PERSUSIA, KINO, JESSIE, INDIE,
NEA, PRETTY P, STORMIE,
SANTANA, VODOO LOUNGE,
INC., KYRON O'BRIEN SR.,
TOAST, INC., COSTCO
WHOLESALE CORP., and JOHN &
JANE ROES #1– 50,

Defendants.

COMES NOW Defendant, Jessica Richardson (“Richardson”) by and through their undersigned counsel, and respectfully request an Order extending Defendants’ responsive Pleading Deadline until 14 days after the Court rules on Plaintiffs’ pending Motion to File Second Amended Complaint (Filing No. 169). In support of this Motion, Defendants show the Court as follows:

1. Pursuant to the Proof of Summons filed by Plaintiff at Filing No. 164, Defendant were served with a copy of the Complaint on April 29, 2025.
2. Defendant filed a Motion to Dismiss for Failure to State a Claim at Filing No. 102 on May 19, 2025 requiring a response by Plaintiffs no later than June 16, 2025. No such response has been filed at this time.
3. On June 11, 2025, Plaintiffs filed an Amended Motion to File Second Amended Complaint.

4. Defendants' deadline to respond to Plaintiffs' Motion is June 25, 2025. It is unknown whether any Defendants will formally oppose Plaintiffs' Motion.
5. Similar to the motion filed by Defendant Waggener (filing No. 170), Defendant Toast, Inc. (Filing No. 172), and Defendants Club 180, AM314 LLC, Matthew Longcor and Ayden Longcor, Defendant Richardson requests that her responsive pleading deadline be extended to 14 days after the Court rules on Plaintiffs' Motion. This will avoid Defendant Richardson from being required to file a responsive pleading to Plaintiffs' current motion, which will become moot if the Court grants the Plaintiffs leave to file a Second Amended Complaint. Further, it will allow Defendants to avoid unnecessary costs that would be required if multiple responsive pleadings must be filed by Defendants.
6. Defendants' counsel attempted to reach Plaintiffs' counsel to no available. Defendant's counsel does not anticipate a response due to Plaintiffs' counsel stating, via email, to Defendant's counsel that he would no longer correspond with Defendant's counsel with a court order.
7. This motion is consistent with the aims of Fed. R. Civ. P. 1, which calls upon "the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding."

WHEREFORE, Defendant Jessica Richardson respectfully requests an Order requiring their responsive pleading deadline to 14 days after the Court rules on Plaintiffs' Motion to File Second Amended Complaint, and granting such other and further relief as the Court deems fair and just.

DATED THIS JUNE 24, 2025

JESSICA RICHARDSON, DEFENDANT

By: s/Lynae Tucker-Chellew
LYNAE TUCKER-CHELLEW #27521
Attorney for Defendant
Dornan, Howard, Breitzkreutz,
Dahlquist & Klein PC LLO
1403 Farnam Street, Suite 232
Omaha, Nebraska 68102
(402) 884-7044 (phone)
Lynae@dtlawyers.com

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2025 I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which automatically sent notification of such filing all attorneys of record. Parties served by the CM/ECF system are as follows:

Kimberly Hernandez
(Plaintiff)

EVAN SPENCER
305 Broadway
7th Floor
New York, NY 10007
917-547-4665
Evan@EvanSpencerEsq.com

Sarah Houston
(Plaintiff)

EVAN SPENCER
305 Broadway
7th Floor
New York, NY 10007
917-547-4665
Evan@EvanSpencerEsq.com

Imagination Industries, Inc.

EVAN SPENCER

| | |
|---|--|
| (Plaintiff) | 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |
| Jane Doe Dancers #1-25 (Plaintiffs) | EVAN SPENCER 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |
| John & Jane Doe Customers #1-100 and all Similarly Situated Residential & Commercial Neighbors of Club 180 (Plaintiffs) | EVAN SPENCER 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |
| John Doe Security Guards #1-7 (Plaintiffs) | EVAN SPENCER 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |
| James Pull 5901 S. 190th Terrace Omaha, NE 68135 (Defendant) | RYAN M. KUNHART DVORAK LAW GROUP 9500 West Dodge Road Suite 100 Omaha, NE 68114 (402) 934-4770 (402) 933-9630 (fax) rkunhart@ddlawgroup.com |
| Casey Rowe | EVAN SPENCER 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |
| Kristen Rozmiarek | EVAN SPENCER 305 Broadway 7th Floor New York, NY 10007 917-547-4665 Evan@EvanSpencerEsq.com |

Chuck Streblow

EVAN SPENCER
305 Broadway
7th Floor
New York, NY 10007
917-547-4665
Evan@EvanSpencerEsq.com

s/Lynae Tucker-Chellew
Lynae Tucker-Chellew #27521
Attorney for Defendant,
Jessica Richardson